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CSD 1143 (04/28/96)

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF CALIFORNIA

DEBTOR: Borrego Community Health Foundation

Petition Date: September 12, 2022

Case No. 22-02384

MONTHLY FEE APPLICATION SUMMARY

APPLICANT: FTI Consulting, Inc.

REPRESENTING: Official Committee of Unsecured Creditors

ORDER APPROVING EMPLOYMENT: Docket No. 242

Task Code	Category	Total Hours	Total Fees
2	Cash & Liquidity Analysis	17.9	\$13,425.00
4	Trade Vendor Issues	4.7	3,525.00
6	Asset Sales	21.8	16,350.00
7	Analysis of Business Plan	0.4	300.00
9	Analysis of Employee Compensation Programs	3.3	2,475.00
11	Prepare for and Attendance at Court Hearings	1.6	1,200.00
14	Analysis of Claims/Liabilities Subject to Compromise	11.9	8,925.00
16	POR & DS - Analysis, Negotiation and Formulation	2.4	1,800.00
18	Potential Avoidance Actions & Litigation Matters	8.8	6,600.00
19	Case Management	6.5	4,875.00
21	General Meetings with Committee & Committee Counsel	4.9	3,675.00
24	Preparation of Fee Application	11.2	8,400.00
26	Strategic Communications	40.9	30,675.00
	TOTAL	136.3	\$102,225.00

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF CALIFORNIA

In re:

BORREGO COMMUNITY HEALTH
FOUNDATION,

Debtor and Debtor in Possession.

Chapter 11 Case

Case No. 22-02384

Judge: Hon. Laura S. Taylor

Monthly Fee Application

FTI Consulting, Inc., together with its wholly owned subsidiaries ("<u>FTI</u>" or the "<u>Firm</u>"), submits its Third Monthly Fee Application for Allowance and Payment of Interim Compensation (the "<u>Application</u>") for the period December 1, 2022 – December 31, 2022 (the "<u>Application Period</u>"). In support of the Application, FTI respectfully represents as follows:

- 1. FTI is the financial advisor to the Official Committee of Unsecured Creditors (the "Committee"). FTI hereby applies to the Court for allowance and payment of interim compensation for services rendered during the Application Period.
- 2. FTI billed a total of \$102,225.00 during the Application Period. The total fees represent 136.3 hours expended during the Application Period. These fees and are broken down as follows:

Application Period	Fees	Expenses	Total
December 1, 2022 –	\$102,225.00	\$0.00	\$102,225.00
December 31, 2022			

3. Accordingly, FTI seeks allowance of interim compensation in the total amount of \$81,780.00 at this time, which represents 80% of fees totaling \$102,225.00 for services rendered. No expenses were incurred during the Application Period.

- 4. To date, FTI has received a total of \$235,680.00 in payment, which represents 80% of cumulative fees for the Firm's first and second monthly fee applications.
- 5. Attached as **Exhibit "A"** hereto is the name of each professional who performed services in connection with this case (the "<u>Case</u>") during the Application Period at the blended hourly rate approved for FTI for this Case. Attached hereto as **Exhibit "B"** is the detailed time and expense statements for the Application Period.
- 6. The Firm has served a copy of this Application on the United States Trustee (the "<u>U.S. Trustee</u>"), the Debtor, counsel to the Debtor, counsel to the Patient Care Ombudsman, the United States of America, and the State of California, and parties requesting special notice (collectively, the "<u>Notice Parties</u>"). The Application was mailed by first class mail, postage prepaid, on or about January 27, 2023. Notice of the filing of this Application was served on the Notice Parties by first class mail, postage prepaid, on or about January 27, 2023.
- 7. Pursuant to this Court's Order on Debtor's Motion for Entry of an Order Establishing Procedures for Monthly Payment of Fees and Expense Reimbursement (the "Interim Compensation Procedures Order") that was entered on or about December 15, 2022 [Docket No. 299], the Debtor is authorized to make the payment requested herein with a further hearing or order of this Court unless an objection to this Application is filed with the Court and served upon the Notice Parties within ten (10) calendar days after the date of mailing of the Notice of this Application. If such an objection is filed, the Debtor is authorized to pay 80% of the uncontested fees and 100% of the uncontested expenses without further order of the Court. If no objection is filed, the Debtor is authorized to pay 80% of all fees requested in the Application and 100% of the uncontested expenses without further order of the Court.
- 8. The interim compensation sought in this Application is not final. Upon the conclusion of this Case, the Firm will seek fees and reimbursement of expenses

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EXHIBIT A

EXHIBIT A
Summary of Hours by Professional for Application Period
(December 1, 2022 – December 31, 2022)

		Billing	Total	Total
Professional	Position	Rate	Hours	Fees
Bilbao, Marc	Senior Managing Director	\$750	1.2	\$900.00
Nelson, Cynthia A	Senior Managing Director	\$750	13.2	\$9,900.00
Zucker, Clifford	Senior Managing Director	\$750	13.0	\$9,750.00
Ganti, Narendra	Managing Director	\$750	9.8	\$7,350.00
Thalassinos, Angelo	Managing Director	\$750	9.5	\$7,125.00
Adeyanju, Michael	Senior Director	\$750	11.1	\$8,325.00
Delaney, Meaghan	Director	\$750	4.1	\$3,075.00
Gray, Michael	Senior Consultant	\$750	20.7	\$15,525.00
Labkoff, Nicole	Senior Consultant	\$750	7.3	\$5,475.00
Cho, Clare	Consultant	\$750	35.9	\$ 26,925.00
Hardey, Samantha	Consultant	\$750	8.6	\$6,450.00
Hellmund-Mora, Marili	Manager	\$750	1.9	\$1,425.00
TOTAL			136.3	\$102,225.00

EXHIBIT B

EXHIBIT B

Detailed Time Statement for Application Period
(December 1, 2022 – December 31, 2022)

Task Category	Date	Professional	Hours	Activity
2	12/2/2022	Zucker, Clifford	0.4	Review and analysis of budget actual results for the week ending 12/2 in cash flow reporting package provided by Ankura.
2	12/2/2022	Ganti, Narendra	0.6	Review budget to actual financials provided by Ankura for the week ending 12/2.
2	12/3/2022	Gray, Michael	0.3	Review cash flow report provided by Ankura for the week ending 12/2.
2	12/3/2022	Gray, Michael	0.6	Prepare analysis on 12/2 budget to actual variance report provided by Ankura.
2	12/3/2022	Gray, Michael	0.4	Prepare report for Committee on cash flow variance provided by Ankura for the week ending 12/2.
2	12/5/2022	Gray, Michael	0.2	Update Committee report for comments re: 12/2 budget to actual variance.
2	12/9/2022	Cho, Clare	1.5	Review historical financial statements to assess Debtor's historical cash and liquidity position.
2	12/16/2022	Zucker, Clifford	0.4	Review and analysis of budget to actual variance report provided by Ankura for the week ending 12/9.
2	12/17/2022	Gray, Michael	0.4	Review cash flow variance report provided by Ankura for the week ending 12/9.
2	12/17/2022	Gray, Michael	0.6	Prepare analysis on cash flow variance for the week ending 12/9.
2	12/17/2022	Gray, Michael	0.7	Update Committee report for cash flow variance analysis for the week ending 12/9.
2	12/18/2022	Gray, Michael	0.3	Review origin of expected cash disbursement in cash forecast provided by Ankura.
2	12/19/2022	Gray, Michael	0.3	Process updates to cash flow variance report at the request of FTI team member.

2	12/19/2022	Gray, Michael	0.4	Prepare for Committee call re: liquidity report.
2	12/21/2022	Cho, Clare	1.8	Review IRS forms and financial statements from data room to assess historical cash position.
2	12/22/2022	Zucker, Clifford	0.4	Review and analysis of budget to actual results for the week ending 12/16.
2	12/23/2022	Zucker, Clifford	0.4	Review and analysis of updated 13-week cash flow forecast provided by Ankura.
2	12/27/2022	Cho, Clare	1.9	Review and analyze updated 13-week cash flow provided by Ankura.
2	12/27/2022	Cho, Clare	2.1	Conduct analysis on cash flow variances for 10-week period ending 12/16/22.
2	12/27/2022	Cho, Clare	0.8	Prepare key points and materials for Committee meeting re: revised 13-week cash flow.
2	12/27/2022	Cho, Clare	1.0	Prepare list of key follow-up diligence questions for Ankura re: revised 13-week cash flow.
2	12/28/2022	Gray, Michael	0.4	Review latest 13-week cash flow to understand Debtor's forecast liquidity position.
2	12/28/2022	Gray, Michael	0.8	Review and update 13-week cash flow analysis.
2	12/29/2022	Zucker, Clifford	0.3	Review and analysis of responses to budget variances.
2	12/29/2022	Gray, Michael	0.7	Review and update 13-week cash flow follow-up diligence questions for Ankura.
2	12/29/2022	Gray, Michael	0.2	Correspond with Ankura re: follow-up 13-week cash flow diligence questions.
2 Total			17.9	
		Cha Chan	1.6	Review newly added agreements for vendor services from data room re:
4	12/6/2022	Cho, Clare	1.0	schedule G contracts.

4	12/16/2022	Cho, Clare	1.9	Review newly added vendor and provider service agreements from data room.
4 Total			4.7	
6	12/1/2022	Zucker, Clifford	1.0	Attend discussion with Ankura re: sale process updates and outreach.
6	12/1/2022	Nelson, Cynthia A	1.0	Participate in call with Ankura regarding sales process update and other case issues.
6	12/1/2022	Ganti, Narendra	1.0	Attend call with Ankura to discuss sale process updates and related case issues.
6	12/2/2022	Zucker, Clifford	0.5	Discuss with FTI team member on open issues re: sale process in advance of Committee meeting.
6	12/2/2022	Zucker, Clifford	0.6	Attend call with Pachulski on sale and operations update.
6	12/2/2022	Nelson, Cynthia A	0.5	Participate in call with FTI team member to prepare for UCC call re: sale process updates.
6	12/2/2022	Gray, Michael	0.4	Review and update omnibus Committee report re: sales process update.
6	12/6/2022	Zucker, Clifford	0.3	Review correspondence with Pachulski re: revised bid procedures.
6	12/8/2022	Zucker, Clifford	1.0	Participate in discussion with Ankura re: sale and operational update.
6	12/8/2022	Zucker, Clifford	0.4	Perform detailed review and analysis of sale process update memo provided by Ankura.
6	12/8/2022	Nelson, Cynthia A	1.0	Participate in weekly update call with Ankura regarding sales process and other case matters.
6	12/8/2022	Gray, Michael	1.0	Attend sale process update discussion with Ankura.
6	12/8/2022	Ganti, Narendra	1.0	Participate in call with Ankura to discuss sale process updates.
6	12/13/2022	Cho, Clare	2.3	Review sale process materials uploaded to virtual data room.

6	12/13/2022	Zucker, Clifford	0.2	Review and analysis of sale process update report.
6	12/14/2022	Nelson, Cynthia A	0.3	Review update of marketing process provided by Ankura.
6	12/14/2022	Gray, Michael	0.5	Review sale process update provided by Ankura in advance of discussion to understand developments with interested parties.
6	12/15/2022	Zucker, Clifford	1.3	Participate in call with Ankura re: sale process diligence.
6	12/15/2022	Nelson, Cynthia A	1.3	Attend call with Ankura to discuss status of sales process.
6	12/15/2022	Gray, Michael	0.4	Prepare sale process outreach summary for inclusion in Committee report.
6	12/15/2022	Gray, Michael	1.3	Participate in sale process update discussion with Ankura.
6	12/15/2022	Ganti, Narendra	1.3	Attend call with Ankura to discuss sale process.
6	12/19/2022	Bilbao, Marc	0.5	Review materials in preparation for Committee call re: sale process.
6	12/21/2022	Zucker, Clifford	0.4	Review and analysis of sale update materials provided by Ankura.
6	12/22/2022	Zucker, Clifford	0.3	Attend discussion with Ankura on sale process status and recent operating results.
6	12/22/2022	Nelson, Cynthia A	0.3	Participate in call with Ankura to discuss status of sales process and other case topics.
6	12/22/2022	Gray, Michael	0.3	Review sale process update materials provided by Ankura in advance of discussion to understand developments with interested parties.
6	12/22/2022	Gray, Michael	0.3	Attend sale process update discussion with Ankura.

6	12/27/2022	Zucker, Clifford	0.3	Review and analysis of sale status report.
6	12/27/2022	Ganti, Narendra	0.4	Review sale process update memo provided by Ankura.
6	12/28/2022	Gray, Michael	0.4	Review latest sales process update provided by Ankura.
6 Total			21.8	
7	12/9/2022	Cho, Clare	0.4	Review turnaround plan projections from data room.
7 Total			0.4	
9	12/6/2022	Cho, Clare	2.2	Review employee agreements, benefits, and compensation from data room.
9	12/21/2022	Cho, Clare	1.1	Review additional employee agreements uploaded to virtual data room.
9 Total			3.3	
11	12/7/2022	Thalassinos, Angelo	1.6	Telephonic attendance (partial) at bankruptcy court hearing re: mediation status, bid procedures motion.
11 Total			1.6	
14	12/1/2022	Cho, Clare	1.4	Prepare analysis on top 20 filed claims.
14	12/1/2022	Cho, Clare	0.5	Prepare report for Committee meeting re: filed and scheduled claims analysis.
14	12/1/2022	Zucker, Clifford	0.5	Review and analysis of certain 503(6)9 claims.

14	12/1/2022	Gray, Michael	0.6	Review and comment on claims analysis.
14	12/2/2022	Cho, Clare	0.9	Prepare analysis on total claims pool provided by Ankura.
14	12/2/2022	Cho, Clare	2.8	Analyze and prepare summary of duplicate claims in the total claims pool.
14	12/2/2022	Cho, Clare	1.1	Analyze and prepare summary of scheduled and filed claims.
14	12/2/2022	Gray, Michael	0.4	Review certain claims as filed to understand size and reasoning.
14	12/2/2022	Gray, Michael	0.5	Review filed claims register and search for duplicates.
14	12/2/2022	Gray, Michael	0.4	Review and update omnibus Committee report re: claims update.
14	12/4/2022	Gray, Michael	0.7	Update omnibus Committee report for FTI team comments re: claims analysis.
14	12/5/2022	Ganti, Narendra	1.2	Review claims register and significant claims.
14	12/5/2022	Ganti, Narendra	0.9	Review and comment on Committee report re: scheduled and filed claims.
14 Total			11.9	
16	12/21/2022	Gray, Michael	0.7	Review proposed DHCS settlement term sheet to understand consideration re: waterfall analysis.
16	12/21/2022	Gray, Michael	1.7	Prepare waterfall analysis under proposed DHCS settlement scenario.

16 Total 2.4

18	12/9/2022	Cho, Clare	0.3	Review Corrective Action Plan (CAP) documents between DHCS and Borrego Health from data room.
18	12/15/2022	Zucker, Clifford	0.6	Review and analysis of proposed Debtor settlement parameters.
18	12/16/2022	Zucker, Clifford	0.8	Participate in call with Debtor's advisors and Pachulski on settlement structure.
18	12/16/2022	Zucker, Clifford	0.5	Participate in discussion with Pachulski re: settlement terms.
18	12/16/2022	Nelson, Cynthia A	0.8	Participate in call with Debtor's advisors and Pachulski to discuss potential proposal to DHCS.
18	12/16/2022	Nelson, Cynthia A	0.5	Attend call with Pachulski to discuss mediation updates.
18	12/16/2022	Ganti, Narendra	0.5	Attend discussion with Pachulski re: status of mediation.
18	12/16/2022	Ganti, Narendra	0.8	Participate in call with Dentons, Ankura, and Pachulski to discuss settlement.
18	12/20/2022	Zucker, Clifford	0.6	Review and analysis of revised Debtor's draft term sheet re: mediation.
18	12/21/2022	Zucker, Clifford	0.6	Participate in call with Debtor's advisors and Pachulski regarding settlement proposal.
18	12/21/2022	Zucker, Clifford	0.2	Attend call with Pachulski on DCHS discussions.
18	12/21/2022	Zucker, Clifford	0.3	Review and analysis of correspondence with Pachulski re: mediation.
18	12/21/2022	Nelson, Cynthia A	0.6	Participate in call with Debtor's advisors and Pachulski regarding mediation.
18	12/21/2022	Nelson, Cynthia A	0.3	Review updates to materials provided to Judge Montali in connection with mediation.

18	12/21/2022	Nelson, Cynthia A	0.2	Review Committee member's comments on approach to mediation.
18	12/21/2022	Gray, Michael	0.6	Participate in discussion with case professionals re: DHCS settlement.
18	12/21/2022	Ganti, Narendra	0.6	Call with Dentons, Ankura, and Pachulski to discuss settlement.
18 Total			8.8	
19	12/6/2022	Cho, Clare	0.7	Update internal data room with new documents provided by Ankura.
19	12/6/2022	Nelson, Cynthia A	0.3	Address status of various FTI workstreams.
19	12/14/2022	Cho, Clare	1.7	Review management policy contracts from data room.
19	12/15/2022	Cho, Clare	1.3	Continue to review management policy contracts from data room.
19	12/15/2022	Cho, Clare	1.2	Review OCR complaint forms from the data room.
19	12/15/2022	Cho, Clare	0.6	Update internal FTI data room and index with new documents provided by Ankura.
19	12/21/2022	Cho, Clare	0.7	Review OSHA government reports form data room.
19 Total			6.5	
21	12/5/2022	Nelson, Cynthia A	0.8	Participate in meeting with Committee to discuss sale process, mediation, cash and claims analyses.
21	12/5/2022	Nelson, Cynthia A	0.3	Prepare for call with Committee on various case workstreams and issues.

21	12/5/2022	Ganti, Narendra	0.8	Attend call with Committee to discuss sale process, liquidity, mediation.
21	12/9/2022	Nelson, Cynthia A	0.2	Correspond with Pachulski regarding update for Committee in lieu of call.
21	12/19/2022	Zucker, Clifford	0.7	Participate in Committee call re: financial and legal update.
21	12/19/2022	Nelson, Cynthia A	0.7	Participate in weekly call with Committee regarding case including status of sales process and updated budget to actual analysis.
21	12/19/2022	Bilbao, Marc	0.7	Attend Committee call to discuss M&A process.
21	12/19/2022	Ganti, Narendra	0.7	Participate in call with Committee to discuss liquidity and sale process.
21 Total			4.9	
21 Total 24	12/1/2022	Gray, Michael	4.9 0.4	Review and update October fee application for FTI team comments.
	12/1/2022	Gray, Michael Cho, Clare	- 17	
24			0.4	application for FTI team comments. Conduct a detailed review of the draft November fee exhibits to comply with
24	12/6/2022	Cho, Clare	0.4	application for FTI team comments. Conduct a detailed review of the draft November fee exhibits to comply with bankruptcy guidelines. Prepare schedules for inclusion in

24	12/7/2022	Cho, Clare	0.9	Update draft November fee exhibits for FTI team comments.
24	12/7/2022	Gray, Michael	0.6	Process updates to the draft November fee exhibits.
24	12/14/2022	Nelson, Cynthia A	0.3	Review draft fee statements for September and October 2022.
24	12/16/2022	Nelson, Cynthia A	0.2	Correspond with Pachulski regarding fee statements.
24	12/16/2022	Gray, Michael	0.4	Begin to prepare November fee application.
24	12/19/2022	Gray, Michael	0.3	Update October fee application for latest billing procedures order entered.
24	12/19/2022	Gray, Michael	0.6	Continue to prepare November fee application.
24	12/21/2022	Nelson, Cynthia A	0.2	Correspond with FTI team regarding October and November fee statements.
24	12/23/2022	Nelson, Cynthia A	1.0	Review drafts of FTI's fee statements for October and November 2022.
24	12/29/2022	Nelson, Cynthia A	0.5	Review and edit October and November fee statements to ensure compliance with bankruptcy guidelines.
24 Total			11.2	
26	12/1/2022	Thalassinos, Angelo	0.3	Continue to develop Committee engagement strategy.
26	12/1/2022	Adeyanju, Michael	0.7	Finalize elected officials mapping deliverable and draft elected officials' strategy email to counsel.

26	12/1/2022	Labkoff, Nicole	0.3	Update elected officials' stakeholder mapping.
26	12/1/2022	Hardey, Samantha	0.1	Monitor media for relevant news and share with counsel and team as needed.
26	12/1/2022	Hardey, Samantha	0.6	Conduct updated analysis for policy-maker mapping.
26	12/2/2022	Thalassinos, Angelo	1.1	Review and develop political and regulatory engagement strategy and related considerations.
26	12/2/2022	Thalassinos, Angelo	0.2	Review recent media articles re: Borrego, current case status.
26	12/2/2022	Labkoff, Nicole	0.2	Continue to prepare stakeholder mapping.
26	12/2/2022	Hardey, Samantha	0.2	Monitor media for relevant news and share with internal strategic communications team.
26	12/5/2022	Thalassinos, Angelo	0.6	Research and develop communications plan re: regulatory, political stakeholders.
26	12/5/2022	Thalassinos, Angelo	0.3	Review recent media articles and circulate same to Committee counsel.
26	12/5/2022	Delaney, Meaghan	1.3	Finalize and deliver completed stakeholder mapping to team.
26	12/5/2022	Adeyanju, Michael	0.8	Strategize and work on elected official mapping deliverable and client email.
26	12/5/2022	Labkoff, Nicole	1.0	Review latest election developments and update elected officials' stakeholder mapping deliverable.
26	12/5/2022	Labkoff, Nicole	0.4	Continue to develop communications and engagement plan and related discussion.

26 12/5/2022 Hardey, Samantha 27 Update elected officials' stakeholder mapping deliverable based on new election developments. 28 12/5/2022 Hardey, Samantha 29 Update elected officials' stakeholder mapping deliverable based on new election developments. 20 12/5/2022 Hardey, Samantha 21 Electron developments. 22 Englassinos, Angelo 23 Angelo 24 Continue to develop communications and strategic engagement plan. 25 Electron developments. 26 Electron developments. 27 Englassinos, Angelo 28 Escarch and develop communications plan re: regulatory, political stakeholders. 29 Electron developments. 20 Electron developments. 20 Electron developments. 21 Electron developments. 22 Electron developments. 23 Electron developments. 24 Evitation develop communications and strategic engagement plan. 25 Electron developments. 26 Electron developments. 27 Electron developments. 28 Electron developments. 29 Electron developments. 20 Electron developments. 20 Electron developments. 20 Electron developments. 21 Electron developments. 22 Electron developments. 23 Electron developments. 24 Electron developments. 25 Electron developments. 26 Electron developments. 27 Electron developments. 28 Electron developments. 29 Electron developments. 20 Electron developments. 20 Electron developments. 21 Electron developments. 22 Electron developments. 23 Electron developments. 24 Electron developments. 25 Electron developments. 26 Electron news and share with Pachulski and internal FTI team as needed. 26 Electron developments. 27 Electron news and share with Pachulski and internal FTI team as needed. 28 Electron developments. 29 Electron developments. 20 Electron developments. 20 Electron developments. 21 Electron developments. 22 Electron developments. 23 Electron developments. 24 Electron developments. 25 Electron developments. 26 Electron developments. 27 Electron developments. 28 Electron developments. 29 Electron developments. 20 Electron developments. 20 Electron developments. 2					
26 12/5/2022 Hardey, Samantha 26 12/6/2022 Hardey, Samantha 27 26 12/6/2022 Thalassinos, Angelo 28 26 12/6/2022 Thalassinos, Angelo 29 20 20 20 20 20 20 20 20 20 20 20 20 20	26	12/5/2022	——————————————————————————————————————	0.2	
26 12/6/2022 Thalassinos, Angelo 0.1 Review recent Borrego media coverage. 26 12/6/2022 Thalassinos, Angelo 0.2 Research and develop communications plan re: regulatory, political stakeholders. 26 12/6/2022 Nelson, Cynthia A 0.2 Obtain an understanding of status of communications outreach and next steps. 26 12/6/2022 Adeyanju, Michael 1.4 mapping deliverable as well as counsel email and send to client. 26 12/6/2022 Hardey, Samantha 0.1 for relevant news and share with Pachulski and internal FTI team as needed. 26 12/6/2022 Hardey, Samantha 0.6 Review latest update to elected officials' stakeholder mapping deliverable. 26 12/7/2022 Thalassinos, Angelo 0.9 Develop communications, engagement plan re: case status, process. 26 12/7/2022 Nelson, Cynthia 0.2 Obtain an understanding of communications status. 26 12/7/2022 Labkoff, Nicole 1.5 Conduct stakeholder mapping research to include latest updates on election results. 27 Monitor media for relevant news and share with counsel and internal strategic	26	12/5/2022		0.7	mapping deliverable based on new
26 12/6/2022 Thalassinos, Angelo 27 12/6/2022 Thalassinos, Angelo 28 12/6/2022 Thalassinos, Angelo 29 12/6/2022 Nelson, Cynthia Angelo 20 12/6/2022 Adeyanju, Michael 20 12/6/2022 Adeyanju, Michael 21 12/6/2022 Adeyanju, Michael 22 12/6/2022 Hardey, Samantha 23 12/6/2022 Hardey, Samantha 24 12/6/2022 Hardey, Samantha 25 12/6/2022 Hardey, Samantha 26 12/6/2022 Hardey, Samantha 27 12/6/2022 Hardey, Samantha 28 12/6/2022 Hardey, Samantha 29 12/6/2022 Hardey, Samantha 20 12/6/2022 Hardey, Samantha 20 12/6/2022 Hardey, Samantha 21 12/6/2022 Hardey, Samantha 22 12/7/2022 Thalassinos, Angelo 23 12/7/2022 Thalassinos, Angelo 24 12/7/2022 Labkoff, Nicole 25 12/7/2022 Labkoff, Nicole 26 12/7/2022 Labkoff, Nicole 27 12/7/2022 Hardey, Samantha 28 12/7/2022 Labkoff, Nicole 29 12/7/2022 Labkoff, Nicole 20 12/7/2022 Hardey, Samantha 20 Obtain an understanding of communications status. 20 12/7/2022 Labkoff, Nicole 21 12/7/2022 Labkoff, Nicole 22 Nonouth and Internal Strategic 23 Nonouth and Internal Strategic 24 Nonitor media for relevant news and share with counsel and internal strategic	26	12/5/2022		0.4	
26 12/6/2022 Angelo 27 Nelson, Cynthia A 28 12/6/2022 Adeyanju, Michael 29 Mardey, Samantha 20 12/6/2022 Hardey, Samantha 20 12/7/2022 Thalassinos, Angelo 21 12/7/2022 Angelo 22 Nelson, Cynthia A 23 Nelson, Cynthia A 24 Nelson, Cynthia A 25 Nelson, Cynthia A 26 12/7/2022 Labkoff, Nicole 27 Nelson, Cynthia A 28 Nelson, Cynthia A 29 Nelson, Cynthia A 20 Nelson, Cynthia A 20 Obtain an understanding of status of communications outreach and next steps. 20 Nelson, Cynthia A 21 Nelson, Cynthia A 22 Obtain an understanding of communications, engagement plan re: case status, process. 28 Nelson, Cynthia A 29 Obtain an understanding of communications status. 20 Nelson, Cynthia A 21 Obtain an understanding of communications status. 20 Nelson, Cynthia A 21 Nelson, Cynthia A 22 Obtain an understanding of communications status. 23 Nelson, Cynthia A 24 Nelson, Cynthia A 25 Nelson, Cynthia A 26 Nelson, Cynthia A 27 Obtain an understanding of communications status. 28 Nelson, Cynthia A 29 Nelson, Cynthia A 20 Obtain an understanding of communications status. 20 Nelson, Cynthia A 21 Nelson, Cynthia A 22 Obtain an understanding of communications status. 23 Nelson, Cynthia A 24 Nelson, Cynthia A 25 Nelson, Cynthia A 26 Nelson, Cynthia A 27 Obtain an understanding of communications status. 28 Nelson, Cynthia A 29 Obtain an understanding of communications status.	26	12/6/2022	•	0.1	Review recent Borrego media coverage.
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26 12/7/2022 Labkoff, Nicole 1.5 Conduct stakeholder mapping research to include latest updates on election results. Monitor media for relevant news and share with counsel and internal strategic	26	12/7/2022		0.9	
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26 12/7/2022 Hardey, 0.1 with counsel and internal strategic	26	12/7/2022	Labkoff, Nicole	1.5	
	26	12/7/2022		0.1	with counsel and internal strategic

26	12/8/2022	Thalassinos, Angelo	0.4	Continue to develop communications, engagement plan and related strategy.
26	12/8/2022	Thalassinos, Angelo	0.1	Review recent Borrego media developments provided by internal FTI team member.
26	12/8/2022	Adeyanju, Michael	0.8	Generate ideas and strategy regarding the sale process and potential grassroots engagement campaign.
26	12/8/2022	Labkoff, Nicole	0.4	Update policymaker mapping deliverable based on new election developments.
26	12/8/2022	Hardey, Samantha	0.1	Monitor media activity on Debtor and circulate to FTI strategic communications team and Pachulski.
26	12/8/2022	Hardey, Samantha	0.7	Review election developments and certifications related to policymaker mapping.
26	12/9/2022	Thalassinos, Angelo	0.3	Review and circulate relevant Borrego media stories to Committee advisors.
26	12/9/2022	Adeyanju, Michael	2.1	Draft strategy memo regarding sale process and potential grassroots engagement efforts ahead of client call on Monday.
26	12/9/2022	Labkoff, Nicole	3.5	Conduct review of latest update to elected officials' stakeholder mapping deliverable.
26	12/9/2022	Hardey, Samantha	0.6	Review relevant news developments and share with internal FTI strategic communications team and Pachulski.
26	12/9/2022	Hardey, Samantha	2.6	Update policymaker mapping deliverable based on new election developments.
26	12/10/2022	Thalassinos, Angelo	0.4	Continue to develop communications, engagement plan and related strategy.
26	12/12/2022	Thalassinos, Angelo	0.7	Participate in discussion with Pachulski re: strategic communications, engagement strategy and related follow-up.

26	12/12/2022	Nelson, Cynthia A	0.8	Participate in call with UCC counsel regarding approach on communications with elected officials.
26	12/12/2022	Adeyanju, Michael	0.7	Participate in call with Pachulski and FTI re: strategic communications strategy.
26	12/12/2022	Adeyanju, Michael	1.2	Review latest additions to constituency engagement research as well as refine go forward strategy.
26	12/12/2022	Adeyanju, Michael	0.5	Review list of facilities for closures and transfers.
26	12/12/2022	Hardey, Samantha	0.1	Review latest media developments and articles re: Borrego Health.
26	12/13/2022	Adeyanju, Michael	0.3	Draft and provide communication to team at Jarrard regarding constituency engagement research and strategy.
26	12/13/2022	Hardey, Samantha	0.1	Review latest media activity on Debtor and circulate to FTI strategic communications team.
26	12/14/2022	Thalassinos, Angelo	0.3	Review strategic engagement strategy.
26	12/14/2022	Nelson, Cynthia A	0.2	Review status of discussion on communication strategy with public agencies.
26	12/14/2022	Adeyanju, Michael	0.7	Prepare and distribute internal summation of discussion and next steps for counsel and FTI.
26	12/14/2022	Hardey, Samantha	0.1	Monitor latest media activity on Debtor and circulate to internal FTI strategic communications team.
26	12/15/2022	Thalassinos, Angelo	0.6	Develop and review strategic engagement strategy.
26	12/15/2022	Adeyanju, Michael	1.1	Finalize constituency engagement strategy deliverable and send to counsel, Debtor and Committee.

26	12/15/2022	Hardey, Samantha	0.1	Search for relevant news about Borrego Health for media clips to be shared with FTI strategic communications team and Pachulski.
26	12/16/2022	Thalassinos, Angelo	0.3	Develop communications, strategic engagement strategy.
26	12/16/2022	Adeyanju, Michael	0.4	Begin to prepare internal strategy on upcoming sale decision deadlines.
26	12/16/2022	Hardey, Samantha	0.1	Search for relevant news developments about Debtor to share with internal FTI strategic communications team.
26	12/19/2022	Hardey, Samantha	0.1	Monitor media activity developments on Debtor and circulate to FTI strategic communications team.
26	12/20/2022	Thalassinos, Angelo	0.2	Continue development of engagement strategy.
26	12/20/2022	Delaney, Meaghan	1.0	Develop go-forward communications activity schedule.
26	12/20/2022	Hardey, Samantha	0.1	Conduct search for media developments on Debtor and share with internal FTI strategic communications team.
26	12/21/2022	Thalassinos, Angelo	0.1	Develop engagement strategy, related planning.
26	12/21/2022	Thalassinos, Angelo	0.2	Review recent Borrego Sun media article re: Borrego Springs Clinic, sale process and circulate same to Pachulski, FTI teams.
26	12/21/2022	Delaney, Meaghan	1.0	Develop go-forward communications activity schedule.
26	12/21/2022	Hardey, Samantha	0.2	Monitor media for relevant news regarding sale process.
26	12/22/2022	Hardey, Samantha	0.1	Monitor media for relevant news articles and share with counsel and internal FTI team.

26	12/27/2022	Thalassinos, Angelo	0.2	Review recent media article re: chapter 11 process and circulate same to Committee counsel.
26	12/27/2022	Thalassinos, Angelo	0.3	Conduct sale and mediation process strategic engagement planning.
26	12/27/2022	Delaney, Meaghan	0.3	Plan and determine long-term communications needs.
26	12/27/2022	Delaney, Meaghan	0.5	Implement changes to go-forward communications needs.
26	12/27/2022	Adeyanju, Michael	0.4	Correspond with internal FTI team re: scheduling grid of next key inflection points and strategy around same.
26	12/27/2022	Hardey, Samantha	0.2	Review media monitor re: recent developments on Borrego and sale process.
26	12/28/2022	Thalassinos, Angelo	0.1	Continue to review recent media article re: chapter 11 process.
26	12/28/2022	Nelson, Cynthia A	0.5	Review recent press on Debtor re: sale process.
26	12/28/2022	Hardey, Samantha	0.2	Review latest news developments on Debtor and share with internal FTI strategic communications team.
26	12/29/2022	Hardey, Samantha	0.1	Search for relevant news developments about Debtor and share with internal FTI team.
26	12/30/2022	Hardey, Samantha	0.1	Review recent media developments about Debtor to share with internal FTI strategic communications team.
26 Total			40.9	
Grand Total			136.3	